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UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

IN RE: Bard IVC Filters Products Liability
 Litigation

No.: 2:15-MD-02641-DGC

**PLAINTIFFS' STATUS REPORT
 FOR THE SIMON NITINOL FILTER
 CASES AND REQUEST TO ADD
 MORE ACCURATE INFORMATION
 TO THE COURT BY JULY 15, 2019**

 This document relates to:
Simon Nitinol Filter Cases

In accordance with the Court's Order on April 29, 2019, Docket Number 17453, counsel for two of the Simon Nitinol Filter ("SNF") cases (*Valentine*, Case No. 17-cv-0579, and *Salmon*, Case No. 17-cv-2866), Nicole Maldonado, hereby submits her Status Report regarding the SNF cases currently filed so that a determination can be made on the best way to proceed on these cases, whether it be remand, proceed with the MDL, or set another status date in order to get a more accurate count of cases that are settling.

Over the last several weeks, Ms. Maldonado has been in contact with lead counsel for both the Plaintiffs and Defendants in the Bard retrievable litigation and has reached out several times to all the firms that have SNF cases filed in this Court. To date, with the exception of a few firms, most of the

firms with SNF cases have responded. According to the responses, it appears that most of the SNF cases filed with this Court have settled or are in the process of settling. Please see the table, below.

Firm	Yes, settled or negotiating	No, not negotiating	Have not responded
Anapol Weiss	X		
Aylstock			X (has two cases)
Babbitt & Johnson	X		
Baird Brown		X (has one case)	
Baum Hedlund	X		
Bertram & Graf	X		
Branch Law Firm			X (has one case)
Burnett Law Firm	X		
Chaffin Luhana	X		
Comeaux	X		
Fenstersheib Law Group	X		
Flint			X (has one case)
Freese & Goss	X		
Gallagher Law Firm	X		
Garland Samuel Loeb	X		
Gray & White			X (has one case)
Guajardo & Marks	X		
James Vernon Weeks		X (has one case)	
Kirkendall Dwyer	X		
Marc J. Bern & Partners			X (has twenty-nine cases)

Firm	Yes, settled or negotiating	No, not negotiating	Have not responded
Matthews Law Firm	X		
McDonald Worley			X (has six cases)
McSweeney Langevin			X (has one case)
Miller Law Firm	X		
Meyers & Flowers	X		
Murphy Law Firm	X		
Napoli Shkolnik		X (has two cases)	
Nemeroff Law Firm			X (has one case)
Padberg		X (has one case)	
Phelan Petty	X		
Plezia & Associates			X (has one case)
Potts Law	X		
Rosenbaum & Rosenbaum	X		
Simon Law Firm			X (has one case)
Sherwood McCormick & Robert			X (has one case)
Tautfest Bond	X		
Tor Hoerman Law	X		
Wilshire		X (has three cases)	

With respect to the firms that have not settled or are not currently negotiating their SNF cases, and the firms that Ms. Maldonado has not heard back from, perhaps an additional two weeks will shed some more insight on whether there will be additional SNF cases settling. Defense counsel, Matthew Lerner, has recently informed Ms. Maldonado that some of the SNF cases will be in track 1 or 2, and

1 because those lists are ever-evolving at the moment, until there is a final list, it may not be entirely
2 clear how many SNF cases will actually remain. Thus, Ms. Maldonado is willing to update this Status
3 Report for the Court on July 15, 2019, so that the Court will have the most current up-to-date
4 information.

5 Dated: July 1, 2019

Respectfully Submitted,

6
7 /s/ Nicole K.H. Maldonado

Nicole K.H. Maldonado, Esq., CA Bar No. 207715

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CERTIFICATE OF SERVICE

I hereby certify that on this day, July 2, 2019, a copy of the foregoing was filed electronically notice of the service of this document will be sent to all parties by operation of the Court's electronic filing system to CM/ECF participants registered to receive service in this matter.

Dated: July 1, 2019

/s/ Nicole K.H. Maldonado

Nicole K.H. Maldonado